

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO**

**IN RE:**

**Chapter 13**

**KIMBERLY VALENTI**

**Case No. 08-53983**

**Judge Marilyn Shea-Stonum**

**DEBTOR'S RESPONSE TO THE  
MOTION FOR RELIEF FROM STAY  
FILED BY FIRST MORTGAGE STRATEGIES**

Now comes Kimberly Valenti, by and through counsel and responds to the Motion for Relief from Stay filed herein by Mortgage Strategies Group, Inc., as follows:

Debtor disputes all allegations contained in the Complaint for want of information. Debtor questions the assignments of said mortgage.

Further responding, debtor states that First Mortgage Strategies Group does not hold a valid first lien mortgage and does not have standing for Motion for Relief.

06/15/2009

/s/ Kimberly Valenti

Kimberly Valeni

Respectfully submitted,

/s/ Donald P. Mitchell, Jr.

Donald P. Mitchell Jr., #0016178

Attorney for Debtor

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was mailed by regular U.S. Mail, postage pre-paid, unless otherwise noted, this 15th day of June 2009 upon the following parties of interest:

Office of the US Trustee, (via ECF)

Robert S. Thomas, Chapter 7 Trustee, (via ECF)

Stacey A. O'Stafy, Esq., Manley Deas Kochalski, LLC (via ECF)

Summit Co. Fiscal Officer, 175 S. Main St., Akron, OH 44308 (by US Mail)

Huntington National Bank, 2361 Morse Rd., NC2W24m Columbus, OH 43229 (by US Mail)

Huntington National Bank, Legal Dept., 41 S. High St., Columbus, OH 43216 (by US Mail)

Huntington National Bank, c/o David W. Cliffe, Esq., 252 Vine St., Ste. 800, Columbus, OH 45202 (by US Mail)

/s/ Donald P. Mitchell Jr.

Donald P. Mitchell, Jr., #0016178